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9 *Investors, LLC*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 VANESSA NELSON

13 Plaintiff,

14 vs.

15 WOOD RESIDENTIAL, LLC; WOOD
16 PARTNERS, LLC; WOOD REAL ESTATE
17 INVESTORS, LLC; and DOES 1-50,
inclusive,

18 Defendants.

Case No. 2:24-cv-00419-ART-BNW

**STIPULATION TO EXTEND THE
DEADLINE FOR DEFENDANTS TO
RESPOND TO PLAINTIFF'S
AMENDED COMPLAINT**

(Third Request)

19 IT IS HEREBY STIPULATED by and between the parties, through their respective counsel,
20 to extend the current deadline. December 4, 2024, for one week to December 11, 2024, for
21 Defendants to file answers to Plaintiff's Amended Complaint.

22 1. On November 20, 2024, the Court granted the parties' stipulation and second request
23 to extend Defendants deadline to file answers to the Amended Complaint to December 4, 2024.
24 ECF No. 51.

25 2. The Amended Complaint includes twelve (12) claims and asserts collective claims
26 under the Fair Labor Standards Act and class action wage related claims under Nevada Revised
27 Statutes Chapter 608, spanning twenty-four (24) pages and 158 discrete paragraphs, plus
28 subparagraphs as to the class/collective claims, requiring substantive responses in answers coupled

1 with affirmative defenses.

2 3. Undersigned Defense Counsel has been diligently working on the answers for the
3 three named Defendants in this case. However, due to the number of claims, allegations, and class
4 claims, and as Undersigned Defense Counsel was traveling out of state last week with family for
5 the Thanksgiving Holiday, Defense Counsel has been unable to complete the answers and needs a
6 short additional one-week extension to complete the answers.

7 4. Further, the Parties are actively discussing whether settlement negotiations and
8 private mediation may facilitate resolution of this case, which they anticipate being able to
9 determine in the next week before the extended deadline for Defendants to file answers.

10 5. Thus, the parties hereby stipulate to extend the deadline one week to December 11,
11 2024, for Defendants to file answers to the Amended Complaint.

12 6. This request is made in good faith and not for the purpose of delay. This is the third
13 request to extend the deadline for Defendants to file answers to the Amended Complaint.

14 Dated this 3rd day of December, 2024.

15 RAFII & ASSOCIATES, P.C.

JACKSON LEWIS P.C.

16 /s/ Jason Kuller

16 /s/ Deverie J. Christensen

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Attorneys for Defendants

21 **ORDER**

22 IT IS HEREBY ORDERED that the deadline for Defendants to file answers to Plaintiff's
23 Amended Complaint is continued to December 11, 2024.

24 Dated this 5th day of December, 2024.

25 
26 United States District Court/Magistrate Judge
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